

Device has 3 radios as follows

125kHz radio operating under 15.209 as detailed in this application

925MHz radio operating under 15.249 as detailed in this application

Previously certified 802.11 module with FCC ID: XF6-RS9113DB

Note: The 2.4GHz operation of this module is not enabled. Only 5GHz band is used.

As seen in the internal photos exhibit, the antenna of the 802.11 module is more than 25mm from the outer case of the device. The device is positioned in the vest assembly such that the side which provides the most clearance to the case is facing the user's body. This ensures that the 802.11 module antenna is at least 25mm away from the user at all times.

Per 447498 D01 General RF Exposure Guidance v06 Appendix A

Worst case SAR exemption threshold limit at 25mm within the 5200-5800MHz frequency range is **31mW**.

Based on the FCC grant of the 802.11 module (FCC ID: XF6-RS9113DB)

The power levels are listed as:

5180-5240MHz = 15.34mW

5745-5825MHz = **16.14mW**

From the test data in this application,

EIRP of 925MHz radio = **0.15mW** (from 87dBuV/m at 3m)

Exemption limit at 925MHz = approximately **79mW** at 25mm (Per 447498 D01 General RF Exposure Guidance v06 Appendix A)

EIRP of 125kHz radio = **84.6mW** (from 114.5dBuV/m at 3m)

Exemption limit at 125kHz = approximately **948mW** at <50mm (Per 447498 D01 General RF Exposure Guidance v06 Appendix C)

The sum of all ratios of power levels to their corresponding exemption limits is < 1 as calculated below:

$$16.14/31 + 0.15/79 + 84.6/948 = 0.62 < 1$$

Therefore device can be considered compliant with FCC's RF radiation exposure limits for general population without SAR testing.